

BEFORE THE
POSTAL REGULATORY COMMISSION
WASHINGTON, D.C. 20268-0001

RETAIL ACCESS OPTIMIZATION INITIATIVE, 2011

Docket No. N2011-1

**MOTION OF THE UNITED STATES POSTAL SERVICE TO FILE
REVISED RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BOLDT
TO PUBLIC REPRESENTATIVE INTERROGATORY PR/USPS-T1-13(c)
[ERRATA]**

The United States Postal Service hereby moves that it be permitted to file the attached response of witness Boldt to the above referenced interrogatory. The original response, filed on August 15, 2011, erroneously indicated that none of the RAO Initiative has carrier operations. The response to interrogatory PR/USPS-20 filed today confirms, on the basis of USPS Library Reference N2011-/NP6, that response was in error. The correct information is documented in USPS Library References N2011-1/21 and N2011-1/21 filed today. For consistency of the evidentiary record, the Postal Service moves that the original response to PR/USPS-T1-13(c) -- as it appears as Tr. Vol. 1 at 241 -- be amended to conform to the revised response filed today.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

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September 23, 2011

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS BOLDT TO
INTERROGAOTRY OF THE PUBLIC REPRESENTATIVE**

Revised: September 23, 2011

PR/USPS-T1-13

Please provide a version of USPS-LR-1 that, for each postal retail facility under consideration for discontinuance, identifies:

- a. If the facility is co-located with a BMEU
- b. If the facility is co -located with a city carrier delivery unit
- c. If the facility is co -located with a rural carrier delivery unit
- d. If the facility is co -located with a mail processing facility
- e. If the facility currently provides any mailers with exceptional dispatch service
- f. How many Post Office boxes are currently:
 1. Located at the facility
 2. Rented at the facility

RESPONSE

- (a) None.
- (b) None.
- (c) See USPS Library References N2011-1/NP14 or N2011-1/21.
- (d) None.
- (e) None.
- (f) A response is forthcoming, with an application for non-public status regarding subpart (2).